



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 24, 2018

VIA EMAIL

**REQUEST TO BE FILED
UNDER SEAL**

The Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

Re: *United States v. [REDACTED]*, 18 Cr. 300 (VC)

Dear Judge Caproni:

In preparing for next week's conferences, the Government realized that the scheduled conference set by the Court in this matter on October 29, 2018 at 11:00 a.m. immediately precedes a previously scheduled 11:30 a.m. court conference in the *Guillen* matter, scheduled to take place before Judge Wood that same day.

In the Government's experience, given the separation orders that are in place to ensure [REDACTED] safety, the U.S. Marshals will not be able to produce, transport and hold [REDACTED] in the courthouse on October 29, 2018 under the circumstances. Thus, the Government respectfully requests that the Court re-set the conference for another date and time convenient for the Court. The Government further advises that there are other potential safety concerns with witnesses being produced for court and/or proffers on Wednesday October 31, 2018 and Wednesday, November 7, 2018 to the extent the Court wishes to avoid those dates as well.

Respectfully submitted,

GEOFFREY S. BERMAN
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FILED 10/24/18